

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

OCT 0 6 2008

Ref: 8EPR-N

Misty A. Hays, Deputy District Ranger Douglas Ranger District 2250 East Richards Street Douglas, WY 82633

> RE: Inyan Kara Analysis Area Vegetation Management Thunder Basin National Grassland Final Environmental Impact Statement; CEQ #20080342

Dear Ms. Hays,

In accordance with EPA's responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4332(2)(C), and our authorities under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (EIS) for the Inyan Kara Area Vegetation Management Thunder Basin National Grassland (TBNG). The project is located in the Douglas Ranger District of the Medicine Bow-Routt National Forest and Thunder Basin National Grassland, Niobrara and Weston Counties, Wyoming.

The EIS was prepared to analyze potential impacts of the proposed action, which would continue to authorize livestock grazing and associated vegetation management actions within the analysis area while resolving disparities between existing conditions and desired conditions in a reasonable timeframe. The Inyan Kara Analysis Area (AA) Area Management Phase II consists of approximately 127, 375 National Forest Service (NFS) acres, located in portions of Weston and Niobrara Counties, Wyoming. The Inyan Kara AA Phase I, conducted in 2006 and 2007, analyzed approximately 27,309 NFS acres under the Categorical Exclusion Authority.

EPA's review found the Final EIS adequately responsive to comments and recommendations submitted for the Draft EIS and discussed in more detail in a telephone conversation between you and Larry Kimmel of my staff on July 14, 2008. The EPA issues previously submitted pertained to documentation of baseline water quality data to be used for future monitoring of grazing impacts, providing additional information on the project's drought management plan, and a recommendation to clarify the decision making process for the adaptive management approach that is integral to the preferred alternative. Each issue has been addressed in the Final EIS to the extent practical, prior to issuing a decision document. The response to the drought management plan issue requires further clarification. This response references the Range Specialists Report as containing tools that may be applied during drought conditions to protect integrity of vegetative and water resources. However, the referenced report appears to not

be discussed in the EIS. In addition, the response states that after the Final EIS approval by the decision maker, Allotment Management Plans (AMPs) and Annual Operating Instructions will be developed to detail specific needs relative to resource conditions. EPA recommends that the AMPs provide more specific information describing applicable tools for resources protection during drought conditions and a brief discussion of the Range Specialists Report pertaining to the drought management plan.

EPA appreciates the opportunity to review the Final EIS. If you have questions regarding EPA's comments, please contact me at (303) 312-6004 or Larry Kimmel, EIS project manager, at (303) 312-6659.

Sincerely,

Larry Svoboda

Director, NEPA Program

Office of Ecosystems Protection and Remediation

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